



K A N S A S

RODERICK L. BREMBY, SECRETARY

DEPARTMENT OF HEALTH AND ENVIRONMENT

KATHLEEN SEBELIUS, GOVERNOR

June 10, 2004

Mr. James C. Brown, Manager Environmental Technology
Olin Corporation
1186 Lower River Road
Charleston, TN 37310



RCRA RECORDS

RE: Future Site Activity Requirements, Former Olin Water Services Facility (Ashland), Fiberglass Road Site, Kansas City, Kansas, Consent Order, Case No.97 - E - 0207

Dear Mr. Brown:

The purpose of this letter is to communicate KDHE's requirement to have Olin Corporation develop and implement added environmental media characterization activities with the intent of completing the Comprehensive Investigation (CI) and Corrective Action Study (CAS) reports. These required items are in response to documented ground water and soil contamination at the referenced facility. This requirement is consistent with paragraphs 7, 22, 23, 32, and Exhibits 3 and 4 of Consent Order and was developed after KDHE completed a thorough review of available file information including: soil gas sample results, past ground water sampling data, historic ownership information in and around the site, and the various preliminary site characterization reports included in the administrative file.

Information requests of historical owners/operators of this and adjacent properties have not yielded information to support Olin's claim for participation by other potential responsible parties (PRPs). However, it is clear from analytical data that in addition to the sewer drop box there are likely source areas along the eastern portion of the site adjacent to and including the Volatile Steam Return (VSR) Sump Vat. Preliminary soil borings SB-C1, SB-C2, SB-C10, SB-C11, SB-G1, SB-G2, SB-G6, SB-G7, SB-G8, and RR [railroad] all show detections for contaminants of concern including volatile organic constituents (VOCs), benzene, toluene, ethyl benzene, xylene (BTEX), and semi-volatile organic contaminants (SVOCs). Ground water samples from sample locations SB-C2, SB-C5, SB-G2, SB-G3, SB-G4, and MW-4 and the recent rounds of ground water monitoring well sampling show detections for VOCs. Some of these detections are up and/or cross gradient of the

C:\WORK - jcook\Ashland Olin\CI-CAS Requirement Letter 610-04 wKL edits.doc

DIVISION OF ENVIRONMENT
Bureau of Environmental Remediation
CURTIS STATE OFFICE BUILDING, 1000 SW JACKSON ST., STE 410, TOPEKA, KS 66612-1367
Phone: 785-296-1673 Fax: 785-296-7030 <http://www.kdhe.state.ks.us>
Printed on Recycled Paper

RECEIVED

JUN 15 2004

ARTD/RCAP

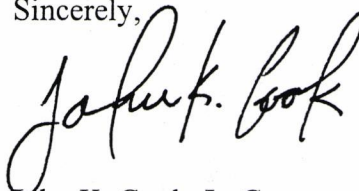
Mr. J. C. Brown
February 6, 2004
Page 2

reported sewer box source area and exceed the Risked Based Standards for Kansas, Risk Manual - 3rd Edition, March 2003, for both residential and non- residential settings.

KDHE expects Olin Corporation to submit a work plan for completion of the CI within 45 calendar days of receipt of this letter. This work plan must include a detailed project schedule showing significant milestone dates including submittal of the Draft/Final CI reports for KDHE review and submittal of the Draft CAS report identifying applicable remedial alternatives.

If you have questions or comments please contact me at (785) 296-8986 or through my electronic mail account "johncook@kdhe.state.ks.us".

Sincerely,



John K. Cook, L. G.
Remedial Section/State Cooperative Unit
Bureau of Environmental Rededication

JKC/lmb

cc. Kurt Limesand -> File Ashland Olin File C4-105-03025 - 1.0
Katherine Dunn, BWM
Ken Herstowski, EPA, Region VII